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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/13/2023

February 10, 2023

VIA ECF AND EMAIL

The Honorable Analisa Torres
United States District Judge
United States District Court for the Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Avangrid Networks, Inc. v. Security Limits, Inc., et al.* (1:22-CV-09622-AT)

Dear Judge Torres:

I am writing jointly on behalf of Defendants Security Limits, Inc. and Paulo Silva (together “Defendants”) and Plaintiffs Avangrid Networks, Inc. and Avangrid Service Company (together, “Plaintiffs”) in connection with the above-captioned matter. Pursuant to Rule III of Your Honor’s Individual Practices in Civil Cases, the parties exchanged the first round of pre-motion letters with respect to Defendants’ contemplated motion to dismiss. Although the deadline for Defendants to respond to the Complaint is currently scheduled for February 15, 2023, Plaintiffs have indicated that they intend to file for leave to amend their complaint. In light of the foregoing, the parties respectfully request the following:

- That Defendants’ deadline to respond to the complaint, which is currently scheduled for February 15, 2023, be stayed due to Plaintiffs’ forthcoming amendment;
- That Plaintiffs shall file an unopposed motion for leave to amend on or before February 24, 2023;¹
- That Defendants’ deadline to respond to the Amended Complaint shall be calculated according to the Federal Rules of Civil Procedure and this Court’s Individual Practices, upon Plaintiffs’ filing of the same.

¹ The original deadline for Defendants to respond to the Complaint was January 16, 2023.

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The parties respectfully submit that the foregoing supplemental schedule will be beneficial, inasmuch as it will not require Defendants to respond to a pleading that will become inoperative. We appreciate Your Honor's time and attention to this matter.

Respectfully submitted,

FISHERBROYLES, LLP

/s/ MATTHEW C. DeFRANCESCO

MATTHEW C. DeFRANCESCO

GRANTED.

SO ORDERED.

Dated: February 13, 2023
New York, New York



ANALISA TORRES
United States District Judge